Federico Peña 11126(1)

City and County of Denver

CITY AND COUNTY BUILDING . DENVER, COLORADO . 80202

March 18, 1987

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Dr. Thomas Vernon
Executive Director
Colorado Department of Health
4210 E. 11th Avenue
Denver, Colorado 80220

Dear Dr. Vernon:

Denver residents have called and written to me with concerns about the proposed test burn of mixed wastes at Rocky Flats. The public is especially concerned about possible increased health risks from airborne contaminants, particularly radioactive emissions, for those downwind of the facility. I share many of those same concerns.

I am opposed to any test burn until a number of very important questions are answered satisfactorily. Everything possible must be done to ensure there will be no increased health risk to the citizens of Denver and the rest of the metro area.

In order to properly assess the potential risk, the Colorado Department of Health (CDH) must ask some additional, tough questions of Rockvell and the Department of Energy (DOE) before a test burn is to be allowed.

The most important questions to be asked have to do with alternatives to a test burn at Rocky Flats. Rocky Flats is located upwind from a major metropolitan area with a population of approximately 1.8 million people. Many DOE facilities are located far away from any population centers. Can DOE conduct trial burns at these facilities? Does DOE plan on incinerating other mixed wastes at their other facilities? What is the risk of transporting the mixed waste elsewhere to be incinerated versus the risk to Denver residents from incineration at Rocky Flats? Is incineration really the only option?

The CDH must also be sure the test burn will adequately reflect the conditions of the ongoing burns to follow the test burn. What exactly is to be burned during the test burn and in what concentrations? Will the same "formula" be used for future burns? Will a scaled-up version of the test burn provide the same destruction efficiency?

Most citizen concerns have been directed at the potential emissions from the facility. There are several questions that need to be answered regarding emissions, monitoring and ash disposal for both the test burn and any subsequent burns. Once regular operations begin, will there be

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continuous monitoring for the concentrations of radioactive gases and particulates from the stacks? What is the size range for particles of plutonium oxide and uranium oxide and what is the efficiency of the filters in trapping these particles? What percentage of the particulates producte by incineration are smaller than 0.3 microns in size? What percentage of those particulates escape and what is the physical makeup of those emissions? How much radioactivity will escape as part of those fine particulates and how much will escape as gases? What will be the hazardous and radioactive content of the ash after incineration? What process will be used for disposal of that ash, and where will it be disposed?

These are just a few of the questions that need to be answered. Many other questions will be outlined by others in their comments you will receive. No trial burn should be allowed unless and until all of these issues are answered to the satisfaction of the CDH and the community as a whole. We should not rush into this in order to need Rockwell's timetable, but we should pursue the answers to these questions in order to guarantee the protection of public health.

Sincerely,

Federico Feña

MAYOR